

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**TOMAS LORENZO PEREZ,
Defendant.**

Criminal No. 97-190 (SEC)

UNITED STATES' RESPONSE TO DEFENDANT'S REQUEST FOR PRODUCTION

TO THE HONORABLE COURT:

COMES NOW the United States of America, through the undersigned attorneys, and very respectfully states and prays as follows:

1. On June 29, 2007, the defendant, Tomás Lorenzo Pérez, filed a Demand for Production of Statements, Records and Motion for Disclosure of Grand Jury Material (hereinafter referred to as 'Demand for Production'). *See* Docket No. 357. The United States filed its Response to the Demand for Production on August 15, 2007, after requesting and receiving an extension of time. *See* Docket No. 359, 360, 361. On October 19, 2007, the Honorable Court denied the referred motion. *See* Docket No. 363.

2. Defendant has now filed a Request for Production of Statements, Records and Motion for Disclosure of Grand Jury Material for Government's Failure to Opposed by 9/15/07 as ordered by the Court (hereinafter referred to as 'Request for Production'). In referred motion, defendant claims that the United States failed to respond to the Demand for Production. *See* Docket No. 357.

5. In compliance with the Court's Order of October 25, 2007, and as indicated above, the United States advises that it did respond to defendant's Demand for Production, and that the Honorable Court did rule on the aforementioned motion. *See* Docket No. 365. For convenience, a copy of the United States' Response to Defendant's Demand for Production of Statements, Records and Motion for Disclosure of Grand Jury Material is herein attached as Exhibit A.

United States' Response to Motion

USA v. Tomas Lorenzo Perez

Criminal No. 97-190 (SEC)

Page 2

WHEREFORE, the United States respectfully requests that defendant's 'Request for Production of Statements, Records and Motion for Disclosure of Grand Jury Material for Government's Failure to Opposed by 9/15/07 as ordered by the Court' be denied.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 6th day of November, 2007.

ROSA EMILIA RODRIGUEZ-VÉLEZ
United States Attorney

s/ Myriam Y. Fernandez-Gonzalez
Myriam Y. Fernández-González
Assistant U.S. Attorney - U.S.D.C. #218011
Room 1201, Torre Chardón Bldg.
350 Carlos Chardón Ave.
San Juan, P.R. 00918
Tel. 766-5656

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of November, 2007, I electronically filed the foregoing with the Clerk of the Court, using the certified mail return receipt notification of such filing to Tomás Lorenzo Pérez, Reg. No. 16054-069, USP COLEMAN I, U.S. PENITENTIARY, P.O. BOX 1033, COLEMAN, FL 33521.

s/ Myriam Y. Fernandez-Gonzalez
Myriam Y. Fernández-González
Assistant U.S. Attorney - U.S.D.C. #218011
Room 1201, Torre Chardón Bldg.
350 Carlos Chardón Ave.
San Juan, P.R. 00918
Tel. 787-766-5656